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Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

***Re: Mobility Fund Phase II, WT Docket 10-208;
Connect America Fund, WC Docket 10-90***

Dear Ms. Dortch,

On July 25, 2017, Stacy Fuller and the undersigned of AT&T Services, Inc., met with Nick Degani, Jay Schwarz, and Rachael Bender of Chairman Pai's office. During the meeting, AT&T expressed support for the Mobility Fund II (MFII) draft Order on Reconsideration and draft Challenge Process Order. Denying petitions aimed at reducing the area considered covered by LTE and adopting, in part, the CTIA proposal for a MFII-specific data collection and challenge process should help target the areas that truly need MFII support.

Specifically, AT&T believes that the modifications the Commission made to the proposal CTIA submitted with respect to cell edge probability and loading factors are appropriate to meet the overriding policy goals of this proceeding. The Connect America Fund is designed to target support to areas that have proven to be uneconomic to serve without subsidy. AT&T's internal analysis supports the draft's conclusion that a 70/30 cell edge probability and loading factor will help drive funding towards truly unserved consumers rather than those that already have high quality LTE service.

AT&T also supports the Commission's decision to not require a specific signal strength benchmark. Attempting to standardize a signal strength to be used by all carriers would generate results that had no relationship to the reality of each carriers' network which is totally at odds with the goal of the data collection. The purpose of propagation modeling is to represent as accurately as possible the coverage characteristics of a carriers' actual network in a specified geography. Thus, signal strength will vary based on carrier-specific differences such as network design, spectrum band, spectrum capacity, and type of equipment. A cell edge throughput benchmark, by contrast, provides each carrier a common standard that is divorced from network variances. An optimized RF propagation model set to meet a throughput benchmark will reflect the multiple signal strengths necessary to meet that benchmark for the entire contour. If the Commission determines that knowing the signal strength(s) used in generating coverage maps would be valuable to other parties in identifying areas to challenge, it could require carriers to provide a standard GRD file (showing every signal value in the contour) with each submission as part of the confidential provider-specific information.

In addition, AT&T urged the Commission to refrain from defining other parameters for the data collection beyond those proposed by CTIA. Rather than improving the quality of the data, such proposals will only complicate the process and constrain the coverage area. For

example, CCA's repeated call for a "determined clutter factor"¹ is puzzling at best because there is no industry standardization of "clutter." Carriers use different geo-data vendors to supply clutter factors and vendors employ different proprietary algorithms and techniques to generate their factors. And because clutter is a representation of land use it obviously must be customized for every area that is being modeled to reflect whether it is a plowed field, an evergreen forest, a crop of corn, or a barn, to name just a few possibilities. To generate an accurate path loss matrix for a single transmitter requires the use of multiple clutter classes that can generate a mosaic of data so complex it's hard to imagine how it could be of use in the MF II context. If the concern is that carriers will not use any clutter when generating MF II maps the CTIA proposal and the draft Order clearly specify that "filers shall use the optimized RF propagation models and parameters used in their normal course of business." This requirement is adequate to ensure that all maps are produced using clutter factors, as well as other common geo-data elements necessary for high-quality propagation modeling. However, if there is a need to make this more explicit, the FCC could modify this guidance to state that "filers shall use the optimized propagation models and parameters used in their normal course of business, including appropriate clutter factors."

The most important decision the Commission can make regarding MF II is to vote to move forward as expeditiously as possible. AT&T shares the ATN/Blue Wireless concern² that the draft Order appears to contemplate multiple additional proceedings and we hope these can be minimized to avoid any delay. Too many Americans in rural areas have no or inadequate mobile wireless voice and broadband service and AT&T urges the Commission to put consumers first and implement MF II.

If you have any questions regarding this filing please do not hesitate to contact me at (202) 457-2041.

Sincerely,

Mary L. Henze

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cc: N. Degani
R. Bender
J. Schwarz

¹ Reply comments of Competitive Carriers Association, WC Docket No. 10-90; WT Docket No. 10-208, at 4 (filed May 11, 2017).

² Letter from L. Charles Keller, Counsel to ATN International and Buffalo-Lake Erie Wireless, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 10-208; WC Docket No. 10-90 (filed July 26, 2017).

